

FILED DATE: 12/19/2018 4:34 PM 2018L013675

ATTY I.D. #25535

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

FILED  
12/19/2018 4:34 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2018L013675

DEBRA HUNT,

Plaintiff,

vs.

ARAMARK FACILITY SERVICES, INC.,

Defendant.

NO. 2018L013675

COMPLAINT AT LAW

NOW COMES the Plaintiff, KATHLEEN MURPHY, by and through her attorneys, SANDMAN, LEVY AND PETRICH, LLC, and complaining of the Defendant, ARAMARK FACILITY SERVICES, INC., alleges and states as follows:

1. That on and prior to March 26, 2018, the Defendant, ARAMARK FACILITY SERVICES, INC. (hereinafter "ARAMARK"), owned and operated a certain commercial cleaning business providing its services including washing and waxing floor surfaces in office buildings and business offices in Chicago and the suburbs in Cook County, Illinois.

2. That on and prior to March 26, 2018, the Defendant, ARAMARK, through its agents and employees, provided cleaning services on the premises of MedCentrix at 1551 Huntington Drive, Calumet City, Illinois.

3. That on and prior to March 26, 2018, the Plaintiff, DEBRA HUNT, was an employee of MedCentrix working in their offices at 1551 Huntington Drive, Calumet City, Illinois, and on March 26, 2018, was walking in the kitchen.

SANDMAN, LEVY  
AND PETRICH, LLC  
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EXHIBIT

A

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4. That on and prior to March 26, 2018, it was the duty of the Defendant, ARAMARK, to perform its services exercising ordinary care to provide for the safety of the Plaintiff.

5. Notwithstanding its duty as aforesaid, Defendant, ARAMARK, acting through its agents and employees, committed one or more of the following negligent acts and/or omissions:

- (a) Carelessly and negligently mopped the floor in the kitchen at a time when people were walking in and through the area;
- (b) Carelessly and negligently failed to place caution wet floor signs in the area where the floor was wet from mopping;
- (c) Carelessly and negligently failed to warn persons in the kitchen that the floor surface was wet; and
- (d) Carelessly and negligently created an unreasonably dangerous condition by making the lunch room floor surface slippery.

6. That Defendant, ARAMARK, knew, or in the exercise of ordinary care should have known of the foregoing unsafe practices and unreasonably dangerous condition of the floor surface and that they existed for a period of time prior to Plaintiff walking in the kitchen.

7. That as a direct and proximate result of one or more of the foregoing negligent acts, the Plaintiff slipped on the wet floor and fell, and as a direct result thereof, the Plaintiff was injured, which injuries caused and continues to cause her pain and suffering, incur expenses necessary medical, and hospital care and treatment, and caused her to be disabled for a certain period of time and prevented her from performing her normal activities of daily living and lost time and earnings from her employment.

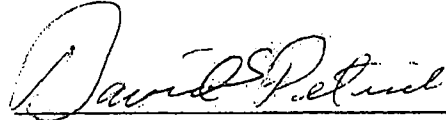
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WHEREFORE, Plaintiff, DEBRA HUNT, prays for judgment against the defendant, ARAMARK FACILITY SERVICES, INC., in an amount in excess of \$50,000.00, plus costs of this lawsuit.

SANDMAN, LEVY AND PETRICH, LLC

By:



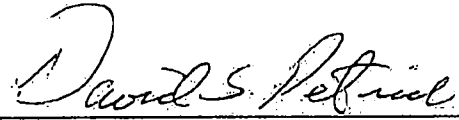
David S. Petrich  
Attorney for Plaintiff(s)

AFFIDAVIT OF DAMAGES

DAVID S. PETRICH, being first duly sworn on oath, deposes and states as follows:

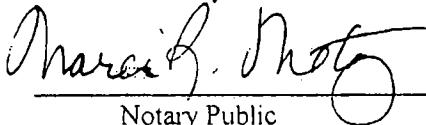
1. That your affiant is one of the attorneys representing the plaintiff(s) in the case of HUNT, DEBRA V. ARAMARK FACILITY SERVICES, LLC.
2. That the money damages sought exceeds \$50,000.00.

FURTHER, your affiant sayeth not.



DAVID S. PETRICH

SUBSCRIBED and SWORN to  
before me this 19 day  
of December, 2018.



Notary Public



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AND PETRICH, LLC  
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